

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY (TRENTON)**  
Caption in compliance with D.N.J. LBR 9004-1(b)

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*Co-Counsel to The Blue Cross Blue Shield  
Association*

In re:

LTL Management LLC,  
Debtor.

Case No.: 23-12825 (MBK)

Chapter 11

Judge: Hon. Michael B. Kaplan

**APPLICATION FOR ADMISSION OF LAUREN G. BARNES *PRO HAC VICE***

The undersigned hereby seeks an Order granting the admission *pro hac vice* of Lauren G. Barnes of the law firm of Hagens Berman Sobol Shapiro LLP, to practice before this Court in connection with the above-captioned case and proceeding. This application (the “Application”) is submitted pursuant to Rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey. Unless requested by other parties, no oral argument is requested. A proposed form of Order is attached. In support of the Application, the Applicant hereby represents as follows:

1. I am an attorney with Halperin Battaglia Benzija, LLP (“HBB”), which law firm maintains an office at 40 Wall Street, 37<sup>th</sup> Floor, New York, New York 10005. HBB has been retained to serve as co-counsel for The Blue Cross Blue Shield Association in connection with the above-captioned bankruptcy case.

2. I am an attorney-at-law of the State of New Jersey and am admitted to practice before the United States District Courts for New Jersey.

3. I submit this Application, pursuant to Civ. Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of Bankruptcy Practice for the United States Bankruptcy Court for the District of New Jersey, in support of an Order Approving Admission, *Pro Hac Vice*, of Lauren G. Barnes, Esq.

4. Ms. Barnes is an attorney with the law firm of Hagens Berman Sobol Shapiro LLP, which maintains an address of 1 Faneuil Hall Square, 5<sup>th</sup> Floor, Boston, Massachusetts 02109.

5. Attached is a certification of Ms. Barnes in which she certifies that she is, and has been, a member in good standing of the bar of the State of Massachusetts since 2005, and is admitted to practice in the United States District Court for the District of Massachusetts; the United States Court of Appeals for the Second Circuit, Seventh Circuit, Eleventh Circuit; the United States Tax Court; and the United States Supreme Court. Additionally, Ms. Barnes certifies that she is, and has remained, a member in good standing of said bars at all times, that no disciplinary proceedings are pending against her in any jurisdiction and no discipline has previously been imposed on her in any jurisdiction.

6. Ms. Barnes is familiar with the circumstances surrounding the above-captioned case and the applicable law, and her presence will serve the best interests of the client.

WHEREFORE, Applicant respectfully requests entry of the Order submitted herewith approving the admission, *pro hac vice*, of Lauren G. Barnes, Esq. to represent The Blue Cross Blue Shield Association as counsel in connection with the above-captioned case.

Dated: April 7, 2023

HALPERIN BATTAGLIA BENZIJA, LLP

/s/ *Walter Benzija*

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